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September 8, 1997

Mr. K. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robinson Parkway  
Nashville, Tennessee 37238

Re: Universal Service Generic Contested Case  
Docket No. 97-00888

Dear Mr. Waddell:

We are enclosing for filing an original and thirteen (13) copies of Petition to Intervene in behalf of the Tennessee Municipal Telecommunications Group.

Thank you for your assistance in this matter.

Sincerely yours,



William C. Carriger  
For the Firm

WCC/dh  
Enclosures

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cc: Counsel on Service List

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BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

In Re: Universal Service Generic :  
Contested Case : Docket No. 97-00888

PETITION OF TENNESSEE MUNICIPAL  
TELECOMMUNICATIONS GROUP FOR LEAVE TO INTERVENE

The Tennessee Municipal Telecommunications Group consists of the following municipal electric systems located in Tennessee: Electric Power Board of Chattanooga, Clarksville Department of Electricity, Fayetteville Electric System, Jackson Utility Division, and Nashville Electric System. The Tennessee Municipal Telecommunications Group represents to the Commission that its members have a substantial interest in the above-entitled proceeding; and, submits this petition for leave to intervene, jointly as members of the Tennessee Municipal Telecommunications Group and severally as individual municipal electric systems. In support thereof, Petitioners would respectfully show:

1. The Tennessee Legislature recently adopted Chapter 531 of the Public Acts of 1997 authorizing municipal electric systems to provide telecommunication services.

2. Each member of the Petitioners has plans to at some point in time furnish local telecommunication services and therefore will be directly affected by the Authority's decisions in this proceeding.

3. Petitioners file this petition for leave to intervene more than seven (7) days prior to the date set for a hearing in this cause; and therefore request as a matter of right, pursuant to the Administrative Procedures Act of the State of Tennessee,

particularly Tennessee Code Annotated § 4-5-310, that it and they be permitted to intervene.

PREMISES CONSIDERED, Petitioners pray:

1. That the Tennessee Regulatory Authority enter an order in this matter allowing the Tennessee Municipal Telecommunications Group and each of its members jointly and severally to intervene, to be heard, to cross-examine witnesses, and to present testimony.

2. That the Tennessee Municipal Telecommunications Group and each of the municipal electric systems, jointly and severally, be made a party record in this cause with the following representatives being listed to receive all documents filed with the Commission:

Carlos C. Smith  
William C. Carriger  
Mark W. Smith  
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3. That the Intervening Petitioners have such other, further, and general relief as to which it may be entitled.

TENNESSEE MUNICIPAL TELECOMMUNICATIONS GROUP

By:



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CERTIFICATE OF SERVICE

I, William C. Carriger, hereby certify that a copy of the foregoing PETITION OF TENNESSEE MUNICIPAL TELECOMMUNICATIONS GROUP FOR LEAVE TO INTERVENE has been served on the following parties by delivering a true and exact copy thereof to the offices of said counsel or by placing a true and exact copy of said pleading in the United States mail addressed to said counsel at his office with sufficient postage thereupon to carry the same to its destination:

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This 8<sup>th</sup> day of September, 1997.

  
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For: Strang, Fletcher, Carriger,  
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